

### SECTION III—REMARKS

This amendment is submitted together with a Request for Continued Examination (RCE) in response to the final Office Action mailed June 27, 2005. Claims 1, 3, 7, 10 and 13 are amended, and claims 1-14 remain pending in the application. Applicants respectfully request reconsideration of the application and allowance of all pending claims in view of the above amendments and the following remarks.

#### Summary of Discussion With Examiner

Applicants' legal representative discussed the current claim amendments with the Examiner in a telephone conversation on or about August 26, 2005. In that conversation, the Examiner agreed with Applicants' legal representative that the present amendment overcomes the rejections based on U.S. Patent No. 6,236,735 to Bjorner *et al.* ("Bjorner"), substantially for the reasons explained below. The Examiner, however, indicated that the amendments raised new issues and would require a new search. Rather than have Applicants submit the amendments in an after-final response that would require an Advisory Action denying entry, the Examiner requested that Applicants proceed directly to filing the amended claims along with an RCE. Hence this amendment and RCE.

#### Rejections Under 35 U.S.C. § 102

The Examiner rejected claims 1, 3-7, 9, 10 and 12-14 as anticipated under 35 U.S.C. § 102(e) by U.S. Patent No. 6,236,735 to Bjorner *et al.* ("Bjorner"). Applicants respectfully traverse the Examiner's rejections. A claim is anticipated only if each and every element, as set forth in the claim, is found in a single prior-art reference. MPEP § 2131; *Verdegaal Bros. v. Union Oil of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). As explained below, Applicants respectfully submit that Bjorner cannot anticipate these claims because it does not disclose every element and limitation recited therein.

Claim 1, as amended, recites an apparatus combination including a machine-vision system comprising an internal camera operatively connected to an image buffer, and a digital signal processing unit and a camera port connected to the image buffer, wherein the port is adapted to allow an external camera to be connected to the machine vision system "so that the same image buffer can capture images from both the internal camera and the external camera." As pointed out by the Examiner in the final Office Action, Bjorner

discloses a system in which a low resolution line buffer 56 captures images from a low resolution line-scan camera 16 and a separate high-resolution line buffer 68 captures images from a high-resolution line-scan camera 22. Thus, in Bjorner each camera has its own image buffer, and the same image buffer does not capture images from both cameras. Bjorner therefore cannot anticipate the claim because it does not disclose, teach or suggest a combination in which “the same image buffer can capture images from both the internal camera and the external camera.” Applicants submit that claim 1 is therefore allowable and respectfully request withdrawal of the rejection and allowance of the claim.

Regarding claims 3-6, if an independent claim is allowable then any claim depending therefrom is also allowable. *See generally* MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claim 1, as amended, is in condition for allowance. Applicants respectfully submit that claims 3-6 are therefore allowable by virtue of their dependence on an allowable independent claim, as well as by virtue of the features recited therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of these claims.

Claim 7, as amended, recites a process combination including capturing a first image using a machine vision system comprising an internal camera, an image buffer, and a digital signal processing unit, storing or processing the first image, and “capturing a second image using an external camera connected to the same image buffer.” By analogy to the discussion above for claim 1, Applicants submit that Bjorner cannot anticipate this claim because it does not disclose, teach or suggest a process combination including “capturing a second image using an external camera connected to the same image buffer.” Applicants submit that claim 7 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Regarding claim 9, if an independent claim is allowable then any claim depending therefrom is also allowable. *See generally* MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claim 1, as amended, is in condition for allowance. Applicants respectfully submit that claim 9 is therefore allowable by virtue of its dependence on an allowable independent claim, as well as by virtue of the features recited

therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of this claim.

Claim 10, as amended, recites a system combination including an internal camera operatively connected to an image buffer, and a digital signal processing unit, a camera port “connected to the same image buffer,” wherein the port is adapted to allow an external camera to be connected to the machine vision system “so that the same image buffer can capture images from both the internal camera and the external camera.” By analogy to the discussion above for claim 1, Applicants submit that Bjorner cannot anticipate this claim because it does not disclose, teach or suggest a system combination including a camera port “connected to the same image buffer” so that “the same image buffer can capture images from both the internal camera and the external camera.” Applicants submit that claim 10 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Regarding claims 12-14, if an independent claim is allowable then any claim depending therefrom is also allowable. *See generally* MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claim 10, as amended, is in condition for allowance. Applicants respectfully submit that claims 12-14 are therefore allowable by virtue of their dependence on an allowable independent claim, as well as by virtue of the features recited therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of these claims.

#### Rejections Under 35 U.S.C. § 103

The Examiner rejected claims 2, 8 and 11 under 35 U.S.C § 103(a) as obvious in view of, and therefore unpatentable over, Bjorner. Applicants respectfully traverse the Examiner’s rejections. If an independent claim is non-obvious under 35 U.S.C. § 103, then any claim depending therefrom is also non-obvious. MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, independent claims 1, 7 and 10, as amended, are in condition for allowance. Applicants respectfully submit that claims 2, 8 and 11 are therefore allowable by virtue of their dependence on allowable independent claims, as well as by virtue of the features recited therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of these claims.

Conclusion

Given the above amendments and accompanying remarks, all claims pending in the application are in condition for allowance. If the undersigned attorney has overlooked a teaching in any of the cited references that is relevant to allowance of the claims, the Examiner is requested to specifically point out where such teaching may be found. Further, if there are any informalities or questions that can be addressed via telephone, the Examiner is encouraged to contact the undersigned attorney at (206) 292-8600.

Charge Deposit Account

Please charge our Deposit Account No. 02-2666 for any additional fee(s) that may be due in this matter, and please credit the same deposit account for any overpayment.

Respectfully submitted,

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